

FILED

FEB 20 2014

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G BRUTON
CLERK, U.S. DISTRICT COURT

DARRAL REED,

Plaintiff,

v.

NO. 12-CV-05947

ALLIED WASTE SERVICES, INC., and
REPUBLIC SERVICES, INC.,
Defendants.

SHARRON COLMAN

MOTION FOR SUBSTITUTION OF ATTORNEY

The plaintiff, Darral Reed, asks leave of Court to seek new counsel in this matter and in support of said request submits the following information:

1. That plaintiff's attorney of record is Daryl Berry.
2. That the defendants filed a Motion for Summary Judgment and Daryl Berry filed a Response to the defendants' Motion.
3. That I spent many hours preparing documents to be used in Mr. Berry's response to the motion for summary judgment and delivered the documents to Mr. Berry's office on January 17, 2013.
4. That I spent many hours in the office of Mr. Berry going over the documents and discussing the responses to the many false allegations of the defendants.
5. That Mr. Berry prepared and filed a Response to the Motion for Summary Judgment without first allowing me the opportunity to review the information.
6. That the Response filed by Mr. Berry did not include the information I provided to him in support of my case.

7. That I do not understand why he made arguments about an arbitration when I never had an arbitration.

8. That over the course of this case I have had numerous concerns because Mr. Berry would not call additional witness for depositions as I requested.

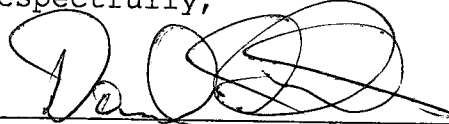
9. That Mr. Berry has not followed up on demanding that Allied provide additional documents requested in discovery.

10. That these failures represent ineffective assistance of counsel and I have reason to believe that the outcome of my case has been severely damaged by Mr. Berry's lack of effort.

Therefore, I ask for the following relief:

- A. That I be given time to find substitute counsel for Daryl Berry;
- B. That I be given time to file an Amended Response to replace the Response filed by Daryl Berry; and
- C. That the Court withhold ruling on the Motion for Summary Judgment.

Respectfully,

A handwritten signature in black ink, appearing to read 'Darral S. Reed', written over a horizontal line.

Darral S. Reed

Darral S. Reed
1309 S. 9th Avenue
Maywood, IL 60153
708-785-9641
quickshift1.dr@gmail.com